

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA LIQUIDATION

(Substantively Consolidated)

In re

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Substantively
Consolidated SIPA Liquidation of Bernard L. Madoff
Investment Securities LLC and Bernard L. Madoff,

Plaintiff,

v.

ESTATE OF JAMES M. GOODMAN; and AUDREY
GOODMAN, in her capacity as Personal
Representative of the Estate of James M. Goodman,

Defendants.

Adv. Pro. No. 10-04762 (CGM)

**DECLARATION OF TARA E. TURNER IN FURTHER SUPPORT OF
TRUSTEE'S MOTION FOR SUMMARY JUDGMENT**

I, Tara E. Turner, declare the following:

1. I am an associate with the law firm of Baker & Hostetler LLP, counsel to Irving H. Picard, as trustee ("Trustee") for the substantively consolidated liquidation of the business of

Bernard L. Madoff Investment Securities LLC (“BLMIS”) under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa–III, and the chapter 7 estate of Bernard L. Madoff. I submit this Declaration in further support of the Trustee’s Motion for Summary Judgment.

2. Attached hereto as Exhibit 1 is a true and correct excerpt of the trial transcript, dated March 7, 2022, in *Picard v. RAR Entrepreneurial Fund, Ltd.*, No. 20-cv-01029 (S.D.N.Y. Mar. 7, 2022), ECF No. 137.

3. Attached hereto as Exhibit 2 is a true and correct excerpt of the trial transcript, dated March 2, 2022, *Picard v. RAR Entrepreneurial Fund, Ltd.*, No. 20-cv-01029 (S.D.N.Y. Mar. 2, 2022), ECF No. 133.

Pursuant to 28 U.S.C. § 1746, I hereby declare under penalty of perjury that the foregoing statements are true and correct.

Dated: April 15, 2022
New York, New York

Respectfully submitted,

BAKER & HOSTETLER LLP

By: /s/ Tara E. Turner
Tara E. Turner